U.S. Department of Justice

United States Attorney
Eastern District of New York

RMP   *271 Cadman Plaza East*
F. #2019R00935   *Brooklyn, New York 11201*

February 3, 2025

<u>By E-Mail and ECF</u>

Ms. Jennifer E. Baumann
Senior United States Probation Officer
147 Pierrepont Plaza
Brooklyn, New York 11201
Jennifer_Baumann@nyep.uscourts.gov

Re: United States v. Mohammad Ibrahim Bazzi
       <u>Criminal Docket No. 23-41 (DLI)</u>

Dear Officer Baumann:

The government has reviewed the defendant's letter, dated January 21, 2025, with objections and proposed amendments to the Presentence Investigation Report disclosed in this case and dated January 6, 2025 ("PSR"). The government's responses are below.

The government agrees with the proposed amendments that merely correct typographical errors (in PSR ¶¶ 11, 12, 18, 30, 57).

All but two of the other proposed amendments relate to biographical or medical information, which the government cannot independently confirm but does not dispute.

As to PSR ¶ 19, the defendant agrees that the Office of Foreign Assets Control ("OFAC") designated him a Specially Designated Global Terrorist ("SDGT") and made a finding that he provided support to Hizballah, although he notes that he does not agree with OFAC's characterization of him. No amendment is needed on this point because the defendant's disagreement with OFAC is immaterial to the charge in this case. He knew that OFAC designated him as an SDGT, and his conduct in contravention of this sanction therefore violated the law, irrespective of any dispute with OFAC.

As to PSR ¶ 29, the defendant is correct and the PSR should be amended to reflect that he made post-arrest statements in Romania admitting to certain facts relating to the

relationships described in the indictment but not, at that time, admitting culpability for the crime to which he has now pleaded guilty.

Very truly yours,

JOHN J. DURHAM
United States Attorney

By: /s/
Robert M. Pollack
Assistant U.S. Attorney
(718) 254-6232

cc: Clerk of the Court (DLI) (by ECF)
Counsel of record (by ECF and E-mail)

2